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10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13 UNITED STATES OF AMERICA, ) No. CR-11-00955 LHK  
14 Plaintiff, ) DECLARATION OF COUNSEL IN  
15 vs. ) SUPPORT OF DEFENDANT'S  
16 LINDA GOMEZ, ) UNOPPOSED *EX PARTE* APPLICATION  
17 Defendant. ) FOR AUTHORIZATION TO RESIDE IN  
18 ) THE DISTRICT OF ARIZONA  
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16 I, Cynthia C. Lie, hereby declare:

17 1. I am the Assistant Federal Public Defender currently assigned to represent  
18 defendant Linda Gomez.

19 2. On January 10, 2012, Ms. Gomez made her initial appearance before this Court  
20 on a summons. She was thereafter released on a \$20,000 personal recognizance bond, secured  
21 by her own signature. The Court imposed no restriction on Ms. Gomez' travel or her ability to  
22 change her residence.

23 3. Ms. Gomez has since appeared as required for two status hearings before the  
24 District Court. Her next scheduled appearance of July 25, 2012, has been vacated, due to a  
25 pending reassignment of the matter to a different district judge. I am informed and believe that  
26 she is in compliance with her conditions of supervision.

1       4. I am informed and believe that, due to financial and family considerations, Ms.  
2 Gomez and her husband intend to relocate from their current residence in Sunnyvale, California,  
3 to a retirement community in Chandler, Arizona.

4       5. On Thursday, July 12, 2012, Supervising United States Pretrial Services Officer  
5 Jaime Carranza informed me that court authorization for the planned move is needed in order for  
6 Pretrial Services to arrange courtesy supervision of Ms. Gomez by their office in the District of  
7 Arizona. Mr. Carranza indicated that he had no opposition to the move.

8       6. On Thursday, July 12, 2012, I informed Assistant United States Attorney Joseph  
9 Fazioli of the planned move. Mr. Fazioli declined to take a position on behalf of the government  
10 without further investigation.

11       7. On Monday, July 16, 2012, Mr. Fazioli responded that the government would not  
12 oppose the planned move, provided that the defense not use Ms. Gomez' move as a pretext for  
13 delaying the proceedings. I informed Mr. Fazioli on July 16, 2012, that the defense had no such  
14 pretextual intentions. Mr. Fazioli confirmed on July 17, 2012, that the government was not  
15 opposed to the proposed move.

16       I declare under penalty of perjury that the foregoing is true and correct and of my  
17 personal knowledge, except as to those matters stated on information and belief, and as to those  
18 matters, I believe them to be true.

19       Executed this 17th day of July 2012, in San Jose, California.

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s/\_\_\_\_\_  
CYNTHIA C. LIE  
Assistant Federal Public Defender

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